

SUPERIOR COURT

SUPERIOR COURT OF
THE DISTRICT OF COLUMBIA
CRIMINAL DIVISION

OF THE

2012 JUN 20 P 4:41

DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on May 29, 2012

THE UNITED STATES OF AMERICA :

v. :

JAMES BREWER, ALSO KNOWN AS
STICKY :

PDID: 520-425 :

STEPHEN PAGE :

PDID: 586-918 :

ANTHONY THOMAS :

PDID: 563-210 :

BRADLEY ALLEN :

PDID: 594-506 :

DCTN: :

Criminal No: 2011 CF1 13446

2011 CF1 13766

2011 CF1 13973

2011 CF2 15798

Violation:

22 D.C. Code, Section 1805 (a), 4502;

22 D.C. Code, Section 801(a), 4502

22 D.C. Code, Section 2801, 4502,

3601(a)(2001 ed.);

22 D.C. Code, Sections 2101, 4502;

22 D.C. Code, Section 402;

22 D.C. Code Section 4503(a)(1);

22 D.C. Code, Section 4504(a);

22 D.C. Code, Section 4504(b) (2001 ed.)

22 D.C. Code, Section 722(a)(3)(B)

22 D.C. Code, Section 2601(a)(1)(2001 ed.)

(Conspiracy; First Degree Burglary While
Armed; Armed Robbery of a Senior Citizen;
Possession Of a Firearm During Crime Of
Violence Or Dangerous Offense; First Degree
Murder While Armed-Felony; Assault with a
Dangerous Weapon; Unlawful Possession of a
Firearm; Carrying a Pistol Without a License
(Outside Home or Place of Business);
Obstruction Justice(Reporting); Escape(From
Institution))

The Grand Jury charges:

FIRST COUNT:

The Conspiracy

On or about June 27, 2011, within the District of Columbia, defendants James Brewer, also known as Sticky, Stephen Page, Anthony Thomas, and a person whose identity is known to the Grand Jury, did knowingly and willingly combine, conspire confederate, and agree together to assault, to burglarize, and to rob, in violation of 22 D.C. Code Sections 401, 801, 2801, and 4502.

Objects of the Conspiracy

The principal goal and purpose of this conspiracy was for the members of the conspiracy to assault, burglarize, and rob Solomon Reese.

Overt Acts

In furtherance of the conspiracy, and in order to effect the objects thereof, defendants James Brewer, also known as Sticky, Stephen Page, Anthony Thomas, and a person whose identity is known to the Grand Jury, in various combinations, in the District of Columbia, directly and indirectly, committed overt acts including, but not limited to, the following:

1. On or about June 27, 2011, defendants James Brewer, also known as Sticky, Stephen Page, Anthony Thomas, and a person whose identity is known to the Grand Jury while armed with a firearm rode to 2300 Good Hope Road, SE, Washington, DC with the intent to rob Solomon Reese.
2. On or about June 27, 2011, defendants James Brewer, also known as Sticky, Stephen Page, and Anthony Thomas entered Solomon Reese's apartment, #829, 2300 Good Hope Road, Washington, DC, with the intent to rob him.
3. On or about June 27, 2011, defendants James Brewer, also known as Sticky, Stephen Page, Anthony Thomas, and a person whose identity is known to the Grand Jury confronted Solomon

Reese and forced him from his chair to the floor.

4. On or about June 27, 2011, when Erika Reese returned to apartment #829, James Brewer, also known as Sticky, forced her inside the apartment and threw her to the floor.

5. On or about June 27, 2011, Anthony Thomas stuffed a blanket inside Erika Reese's mouth for the purpose of silencing her screams.

6. On or about June 27, 2011, Anthony Thomas threatened to kill Erika Reese.

7. On or about June 27, 2011, James Brewer, also known as Sticky, and Stephen Page, while armed, wrestled with Solomon Reese for the purpose of taking his property.

8. On or about June 27, 2011, James Brewer, also known as Sticky, and Stephen Page ordered Solomon Reese to stop resisting.

9. On or about June 27, 2011, after Solomon Reese refused to submit, Stephen Page, while armed with a firearm, repeatedly shot him.

10. On or about June 27, 2011, defendants James Brewer, also known as Sticky, Stephen Page, and Anthony Thomas took two leather bags and cigarettes from Solomon Reese.

11. On or about June 27, 2011, defendants James Brewer, also known as Sticky, Stephen Page, and Anthony Thomas fled 2300 Good Hope Road SE, Washington, DC for the purpose of evading apprehension.

12. On or about June 27, 2011, defendants James Brewer, also known as Sticky, Stephen Page, Anthony Thomas, and a person whose identity is known to the Grand Jury met to divide the proceeds of the robbery.

(Conspiracy, in violation of DC Code Section 1805a, 401, 801, 2801, 4502)

SECOND COUNT

On or about June 27, 2011, within the District of Columbia, James Brewer, also known as Sticky, Anthony Thomas, Stephen Page, and a person whose identity is known to the Grand Jury, while armed with a firearm, entered the dwelling of Solomon Reese, while Solomon Reese was inside that dwelling with intent to steal property of another. (First Degree Burglary While Armed, in violation of 22 D.C. Code, Section 801(a), 4502 (2001 ed.))

THIRD COUNT:

On or about June 27, 2011, within the District of Columbia, James Brewer, also known as Sticky, Anthony Thomas, Stephen Page, and a person whose identity is known to the Grand Jury did possess a firearm, while committing the crime of burglary as set forth in the second count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FOURTH COUNT:

On or about June 27, 2011, within the District of Columbia, James Brewer, also known as Sticky, Anthony Thomas, Stephen Page, and a person whose identity is known to the Grand Jury while armed with a firearm, by force and violence, against resistance and by putting in fear, stole and took from the person and from the immediate actual possession of Solomon Reese, a person sixty years of age or older, property of value belonging to Solomon Reese, consisting of a leather bag and its contents. (Armed Robbery of a Senior Citizen, in violation of 22 D.C. Code, Section 2801, 4502, 3601(a)(2001 ed.))

FIFTH COUNT:

On or about June 27, 2011, within the District of Columbia, James Brewer, also known as Sticky, Anthony Thomas, Stephen Page, and a person whose identity is known to the Grand Jury did possess a firearm, while committing the crime of robbery as set forth in the fourth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

SIXTH COUNT:

On or about June 27, 2011, within the District of Columbia, James Brewer, also known as Sticky, Anthony Thomas, Stephen Page, and a person whose identity is known to the Grand Jury, while armed with a firearm, in perpetrating and attempting to perpetrate the crime of burglary, as set forth in the second count of this indictment, killed Solomon Reese by shooting him with a firearm, on or about June 27, 2011, thereby causing injuries from which Solomon Reese died on or about June 27, 2011. (First Degree Murder While Armed-Felony Murder, in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

SEVENTH COUNT:

On or about June 27, 2011, within the District of Columbia, James Brewer, also known as Sticky, Anthony Thomas, Stephen Page, and a person whose identity is known to the Grand Jury did possess a firearm, while committing the crime of felony murder as set forth in the sixth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

EIGHTH COUNT:

On or about June 27, 2011, within the District of Columbia, James Brewer, also known as Sticky, Anthony Thomas, Stephen Page, and a person whose identity is known to the Grand Jury, while armed with a firearm, in perpetrating and attempting to perpetrate the crime of robbery, as set forth in the fourth count of this indictment, killed Solomon Reese by shooting him with a firearm, on or about June 27, 2011, thereby causing injuries from which Solomon Reese died on or about June 27, 2011. (First Degree Murder While Armed-Felony Murder, in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

NINTH COUNT:

On or about June 27, 2011, within the District of Columbia, James Brewer, also known as Sticky, Anthony Thomas, Stephen Page, and a person whose identity is known to the Grand Jury did possess a firearm, while committing the crime of felony murder as set forth in the eighth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

TENTH COUNT:

On or about June 27, 2011, within the District of Columbia, James Brewer, also known as Sticky, Anthony Thomas, Stephen Page, and a person whose identity is known to the Grand Jury assaulted Erika Reese with a dangerous weapon, that is, a firearm. (Assault with a Dangerous Weapon, in violation of 22 D.C. Code, Section 402 (2001 ed.))

ELEVENTH COUNT:

On or about June 27, 2011, within the District of Columbia, James Brewer, also known as Sticky, Anthony Thomas, Stephen Page, and a person whose identity is known to the Grand Jury did possess a firearm, while committing the crime of assault with a dangerous weapon as set forth in the tenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

TWELFTH COUNT:

On or about June 27, 2011, within the District of Columbia, James Brewer, also known as Sticky, and Stephen Page, previously having been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, owned, kept and had within their possession and control, a firearm. (Unlawful Possession of a Firearm, in violation of 22 D.C. Code Section 4503(a)(1) (2001 ed.))

THIRTEENTH COUNT:

On or about June 27, 2011, within the District of Columbia, Anthony Thomas did carry, openly and concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

FOURTEENTH COUNT:

The Conspiracy

On or about July 7, 2011, within the District of Columbia, defendants James Brewer, also known as Sticky, Stephen Page, and Anthony Thomas did knowingly and willingly combine, conspire confederate, and agree together to endeavor to influence, intimidate Dwight Hicks with the intent to hinder, delay prevent and dissuade Dwight Hicks, from reporting to a law enforcement officer the commission of, and any information concerning the murder charged in the sixth count of this indictment. (Obstruction Justice (Reporting), in violation of 22 DC. Code, Section 722 (a)(3)(B) (2001 ed.)

Objects of the Conspiracy

The principal goal and purpose of this conspiracy was for the members to prevent and dissuade Dwight Hicks from reporting information regarding the murder of Solomon Reese, Jr. to law enforcement officers.

Overt Acts

In furtherance of the conspiracy, and in order effect te objects thereof, defendants James Brewer, also known as Sticky, Stephen Page, Anthony Thomas, and Dwight Hicks, in various combinations, in the District of Columbia, directly and indirectly, committed overt acts including, but not limited to, the following:

1. On or about July 7, 2011, defendants James Brewer, also known as Sticky, Stephen Page, Anthony Thomas, and a person whose identity is known to the Grand Jury, met and discussed the Metropolitan Police Department's execution of a search warrant of the premises located at 2300 Good Hope Road, SE, apt. # 712, Washington, DC, by members of the Metropolitan Police Department, and that detectives believed they were responsible for the murder of Solomon Reese.

2. On or about July 9, 2011, defendants James Brewer, also known as Sticky, Stephen Page, and Anthony Thomas, met and discussed preventing Dwight Hicks from providing information to detectives pertaining to the murder of Solomon Reese, in order to avoid their apprehension.

3. On or about July 9, 2011, defendants James Brewer, also known as Sticky, Stephen Page, and Anthony Thomas, met again and discussed killing Dwight Hicks in order to prevent him from providing information to detectives pertaining to the murder of Solomon Reese in order to avoid apprehension.

4. On or about July 9, 2011, defendant's James Brewer, also known as Sticky, Stephen Page, and Anthony Thomas went to an house located at 1738 Stanton Terrace, SE, for the purpose of luring Dwight Hicks to accompany them to a location in Prince George's County, Maryland so that they could kill him.

5. On or about July 10, 2011, James Brewer, also known as Sticky, and Stephen Page drove Dwight Hicks to a location in Prince George's County, Maryland for the purpose of killing him.
(Conspiracy, in violation of 22 D.C. Code Sections 1805a, 722 (a)(3)(B)(2001 ed.)

FIFTEENTH COUNT:

The Conspiracy

On or about July 15, 2011, within the District of Columbia, defendants James Brewer, also known as Sticky, and Bradley Allen did knowingly and willingly combine, conspire confederate, and agree together to bring about the escape of James Brewer, also known as Sticky, from a penal institution and facility, in which he was confined pursuant to an order issued by a court, judge or magistrate, of the District of Columbia. (Escape (From Institution), in violation of 22 D.C. Code, Section 2601 (a)(2) 2001 ed.))

Overt Acts

In furtherance of the conspiracy, defendants James Brewer, also known as Sticky, and Bradley Allen, in various combinations, in the District of Columbia, directly and indirectly, committed overt acts including, but not limited to, the following:

1. On or about July 15, 2011, defendants James Brewer, also known as Sticky, and Bradley Allen, while in the cell block, behind Courtroom C-10, awaiting presentment, discussed and agreed to exchange the wristband attached to Bradley Allen and containing a lock-up number and PDID#, for money to be provided by Brewer once he escaped.

2. On or about July 15, 2011, defendant Bradley Allen, while in the cell block, behind Courtroom C-10, awaiting presentment, removed his wristband which contained the lock-up number and PDID# assigned to him.

3. On or about July 15, 2011, defendant James Brewer, also known as Sticky, while in the cell block, behind Courtroom C-10, awaiting presentment, attached the wristband described in overt act two above, bearing the lock-up number and number and PDID # assigned to Bradley Allen.

4. On or about July 15, 2011, defendant James Brewer, also known as Sticky, while inside Courtroom C-10, at presentment, when directed to state his name stated "Bradley Allen."

5. On or about July 15, 2011, defendant James Brewer, also known as Sticky, while inside Courtroom C-10, signed "Bradley Allen" on the notice to return to court.

6. On or about July 15, 2011, defendant James Brewer, also known as Sticky, was released into the general public because he assumed the identity of Bradley Allen.

(Conspiracy, in violation of 22 D.C. Code Section 1805a, 2601(a)(1)(2001 ed.)

SIXTEENTH COUNT

On or about July 15, 2011, within the District of Columbia, James Brewer, also known as Sticky, did escape from a penal institution and facility, in which he was confined pursuant to an order issued by a court, judge or magistrate, of the District of Columbia. (Escape (From Institution), in violation of 22 D.C. Code, Section 2601(a)(1)(2001 ed.))

Ronald C. Machen Jr /cdw

RONALD C. MACHEN JR.
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in and for the District of Columbia

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